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Proposed Counsel to the Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	Chapter 11
)	
HOLLANDER SLEEP PRODUCTS, LLC, <i>et al.</i> , ¹)	Case No. 19-11608 (MEW)
)	
Debtors.)	(Jointly Administered)
)	

**AGENDA FOR HEARING TO BE HELD
JULY 1, 2019, AT 2:00 P.M. (PREVAILING EASTERN TIME)**

Time and Date of Hearing: July 1, 2019, at 2:00 p.m. (prevailing Eastern Time)

Location of Hearing: The Honorable Judge Michael E. Wiles
United States Bankruptcy Court for the Southern District of New York
One Bowling Green, Courtroom 617
New York, New York 10004

Copies of Motions: A copy of each pleading can be viewed on the Court's website at <http://www.nysb.uscourts.gov> and the website of the Debtors' notice and claims agent, Omni Management Group, at www.omnimgt.com/hollander. Further information may be obtained via email at hollander@omnimgt.com, or by calling (844) 212-9942 (for domestic or Canadian callers), or internationally at (818) 906-8300.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Dream II Holdings, LLC (7915); Hollander Home Fashions Holdings, LLC (2063); Hollander Sleep Products, LLC (2143); Pacific Coast Feather, LLC (1445); Hollander Sleep Products Kentucky, LLC (4119); Pacific Coast Feather Cushion, LLC (3119); and Hollander Sleep Products Canada Limited (3477). The location of the Debtors' service address is: 901 Yamato Road, Suite 250, Boca Raton, Florida 33431.

I. Matters to be heard

1. ***DIP Motion.*** Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing the Debtors to Obtain Postpetition Financing, (B) Authorizing the Debtors to use Cash Collateral, (C) Granting Liens and Providing Superpriority Administrative Expense Status, (D) Granting Adequate Protection to the Prepetition Lenders, (E) Modifying the Automatic Stay, (F) Scheduling a Final Hearing, and (G) Granting Related Relief [Docket No. 13].

Objection Deadline: June 6, 2019, at 4:00 p.m. (prevailing Eastern Time).

Related Documents:

- A. ***Declaration in Support of DIP Motion.*** Declaration of Saul Burian in Support of the Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing the Debtors to Obtain Postpetition Financing, (B) Authorizing the Debtors to use Cash Collateral, (C) Granting Liens and Providing Superpriority Administrative Expense Status, (D) Granting Adequate Protection to the Prepetition Lenders, (E) Modifying the Automatic Stay, (F) Scheduling a Final Hearing, and (G) Granting Related Relief [Docket No. 19].
- B. Interim Order (A) Authorizing the Debtors to Obtain Postpetition Financing, (B) Authorizing the Debtors to use Cash Collateral, (C) Granting Liens and Providing Superpriority Administrative Expense Status, (D) Granting Adequate Protection to the Prepetition Lenders, (E) Modifying the Automatic Stay, (F) Scheduling a Final Hearing, and (G) Granting Related Relief [Docket No. 53].
- C. Notice of Second Day Hearing [Docket No. 80].
- C. Disclosure of Financing Fees and Notice of Hearings to (A) Consider Approval of the Debtors' DIP Term Loan Facility on a Final Basis and the Debtors' Entry Into Exit Financing Term Loan Commitment and Fee Letters and (B) Consider Approval of the Debtors' DIP ABL Facility on a Final Basis [Docket No. 149].

Responses Received:

- D. None.

Status: This matter is going forward.

2. ***Sealing Motion.*** Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to File Exit Backstop Commitment Letter and Fee Letters Under Seal and (II) Granting Related Relief [Docket No. 20].

Objection Deadline: June 6, 2019, at 4:00 p.m. (prevailing Eastern Time).

Related Documents:

- A. Notice of Second Day Hearing [Docket No. 80].
- B. Certificate of No Objection Regarding Order (I) Authorizing the Debtors to File Exit Backstop Commitment Letter and Fee Letters Under Seal and (II) Granting Related Relief [Docket No. 141].
- C. Notice of Filing Redacted Exit Backstop Commitment Letter and Fee Letters [Docket No. 138].
- D. Disclosure of Financing Fees and Notice of Hearings to (A) Consider Approval of the Debtors' DIP Term Loan Facility on a Final Basis and the Debtors' Entry Into Exit Financing Term Loan Commitment and Fee Letters and (B) Consider Approval of the Debtors' DIP ABL Facility on a Final Basis [Docket No. 149].

Responses Received:

- E. Objection of the United States Trustee to the Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to File Exit Backstop Commitment Letter and Fee Letters Under Seal and (II) Granting Related Relief [Docket No. 91].

Status: This matter is going forward.

3. ***Bidding Procedures Motion.*** Debtors' Motion Seeking Entry of an Order (I) Approving the Bidding Procedures and Related Dates and Deadlines, (II) Scheduling Hearings and Objection Deadlines with Respect to the Debtors' Disclosure Statement and Plan Confirmation, and (III) Granting Related Relief [Docket No. 22].

Objection Deadline: June 6, 2019, at 4:00 p.m. (prevailing Eastern Time).

Related Documents:

- A. Notice of Second Day Hearing [Docket No. 80].
- B. Certificate of No Objection Regarding Order (I) Approving the Bidding Procedures and Related Dates and Deadlines, (II) Scheduling Hearings and Objection Deadlines with Respect to

the Debtors' Disclosure Statement and Plan Confirmation, and (III) Granting Related Relief [Docket No. 131].

Responses Received:

C. None.

Status: This matter is going forward.

4. **Cash Management Motion.** Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue to Perform Intercompany Transactions, and (II) Granting Related Relief [Docket No. 4].

Objection Deadline: June 6, 2019, at 4:00 p.m. (prevailing Eastern Time).

Related Documents:

- A. Interim Order (I) Authorizing the Debtors to (A) Continue to Operate their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue to Perform Intercompany Transactions, and (II) Granting Related Relief [Docket No. 47].
- B. Notice of Second Day Hearing [Docket No. 80].

Responses Received:

C. None.

Status: This matter is going forward.

5. **Wages Motion.** Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs, and (II) Granting Related Relief [Docket No. 5].

Objection Deadline: June 6, 2019, at 4:00 p.m. (prevailing Eastern Time).

Related Documents:

- A. Interim Order (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs, and (II) Granting Related Relief [Docket No. 48].
- B. Notice of Second Day Hearing [Docket No. 80].

- C. Certificate of No Objection re Final Order (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs, and (II) Granting [Docket No. 117].

Responses Received:

- D. None.

Status: This matter is going forward.

6. ***All Vendors Motion.*** Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Prepetition Claims of (A) Lien Claimants, (B) Import Claimant, (C) 503(B)(9) Claimants, (D) Foreign Vendors, and (E) Critical Vendors, (II) Confirming Administrative Expense Priority of Outstanding Orders, and (III) Granting Related Relief [Docket No. 6].

Objection Deadline: June 6, 2019, at 4:00 p.m. (prevailing Eastern Time).

Related Documents:

- A. Interim Order (I) Authorizing the Debtors to Pay Prepetition Claims of (A) Lien Claimants, (B) Import Claimant, (C) 503(B)(9) Claimants, (D) Foreign Vendors, and (E) Critical Vendors, (II) Confirming Administrative Expense Priority of Outstanding Orders, and (III) Granting Related Relief [Docket No. 49].
- B. Notice of Second Day Hearing [Docket No. 80].
- C. Certificate of No Objection Regarding Final Order (I) Authorizing the Debtors to Pay Prepetition Claims of (A) Lien Claimants, (B) Import Claimant, (C) 503(B)(9) Claimants, (D) Foreign Vendors, and (E) Critical Vendors, (II) Confirming Administrative Expense Priority of Outstanding Orders, and (III) Granting Related Relief [Docket No. 118].

Responses Received:

- D. None.

Status: This matter is going forward.

7. ***Surety Bond Motion.*** Debtors' Motion for Entry of an Order (A) Authorizing the Debtors to Continue and Renew Their Surety Bond Program and (B) Granting Related Relief [Docket No. 16].

Objection Deadline: June 6, 2019, at 4:00 p.m. (prevailing Eastern Time).

Related Documents:

- A. Notice of Second Day Hearing [Docket No. 80].
- B. Certificate of No Objection Regarding Order (A) Authorizing the Debtors to Continue and Renew Their Surety Bond Program and (B) Granting Related Relief [Docket No. 126].

Responses Received:

- C. None.

Status: This matter is going forward.

8. ***Insurance Motion.*** Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to (A) Continue Insurance Coverage Entered Into Prepetition and Satisfy Prepetition Obligations Related Thereto, (B) Renew, Supplement, Modify, or Purchase Insurance Coverage, and (C) Continue to Pay Brokerage Fees, and (II) Granting Related Relief [Docket No. 15].

Objection Deadline: June 6, 2019, at 4:00 p.m. (prevailing Eastern Time).

Related Documents:

- A. Notice of Second Day Hearing [Docket No. 80].
- B. Certificate of No Objection Regarding Order (I) Authorizing the Debtors to (A) Continue Insurance Coverage Entered into Prepetition and Satisfy Prepetition Obligations Related Thereto, (B) Renew, Supplement, Modify, or Purchase Insurance Coverage, and (C) Continue to Pay Brokerage Fees, and (II) Granting Related Relief [Docket No. 116].

Responses Received:

- C. None.

Status: This matter is going forward.

9. ***Taxes Motion.*** Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing the Payment of Certain Prepetition Taxes and Fees and (B) Granting Related Relief [Docket No. 8].

Objection Deadline: June 6, 2019, at 4:00 p.m. (prevailing Eastern Time).

Related Documents:

- A. Interim Order (A) Authorizing the Payment of Certain Prepetition Taxes and Fees and (B) Granting Related Relief [Docket No. 86].
- B. Notice of Second Day Hearing [Docket No. 80].
- C. Certificate of No Objection Regarding Final Order (A) Authorizing the Payment of Certain Prepetition Taxes and Fees and (B) Granting Related Relief [Docket No. 125].

Responses Received:

- D. None.

Status: This matter is going forward.

10. ***Customer Programs Motion.*** Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing the Debtors to Maintain and Administer their Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto and (B) Granting Related Relief [Docket No. 7].

Objection Deadline: June 6, 2019, at 4:00 p.m. (prevailing Eastern Time).

Related Documents:

- A. Interim Order (A) Authorizing the Debtors to Maintain and Administer their Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto and (B) Granting Related Relief [Docket No. 50].
- B. Notice of Second Day Hearing [Docket No. 80].
- C. Certificate of No Objection Regarding Final Order (A) Authorizing the Debtors to Maintain and Administer Their Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto and (B) Granting Related Relief [Docket No. 127].

Responses Received:

- D. None.

Status: This matter is going forward.

11. ***Utilities Motion.*** Debtors' Motion for Entry of an Order (A) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Service, (B) Determining Adequate Assurance of Payment for Future Utility Services, (C) Establishing Procedures for Determining Adequate Assurance of Payment, and (D) Granting Related Relief [Docket No. 17].

Objection Deadline: June 6, 2019, at 4:00 p.m. (prevailing Eastern Time).

Related Documents:

- A. Notice of Second Day Hearing [Docket No. 80].
- B. Certificate of No Objection Regarding Order (A) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Service, (B) Determining Adequate Assurance of Payment for Future Utility Services, (C) Establishing Procedures for Determining Adequate Assurance of Payment, and (D) Granting Related Relief [Docket No. 130].

Responses Received:

- C. None.

Status: This matter is going forward.

12. ***Case Management Motion.*** Debtors' Motion for Entry of an Order (A) Establishing Certain Notice, Case Management, and Administrative Procedures and (B) Granting Related Relief [Docket No. 14].

Objection Deadline: June 6, 2019, at 4:00 p.m. (prevailing Eastern Time).

Related Documents:

- A. Notice of Second Day Hearing [Docket No. 80].
- B. Certificate of No Objection Regarding Order (A) Establishing Certain Notice, Case Management, and Administrative Procedures and (B) Granting Related Relief [Docket No. 115].

Responses Received:

- C. None.

Status: This matter is going forward.

II. Retention Applications

13. ***Interim Compensation Motion.*** Debtors' Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals [Docket No. 65].

Objection Deadline: June 6, 2019, at 4:00 p.m. (prevailing Eastern Time).

Related Documents:

- A. Notice of Second Day Hearing [Docket No. 80].
- B. Certificate of No Objection Regarding Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals [Docket No. 129].

Responses Received:

- C. None.

Status: This matter is going forward.

14. ***Ordinary Course Professionals Motion.*** Debtors' Motion for Entry of an Order (A) Authorizing the Retention and Compensation of Certain Professionals Utilized in the Ordinary Course of Business and (B) Granting Related Relief [Docket No. 67].

Objection Deadline: June 6, 2019, at 4:00 p.m. (prevailing Eastern Time).

Related Documents:

- A. Notice of Second Day Hearing [Docket No. 80].
- B. Certificate of No Objection Regarding Order (A) Authorizing the Retention and Compensation of Certain Professionals Utilized in the Ordinary Course of Business and (B) Granting Related Relief [Docket No. 132].

Responses Received:

- C. None.

Status: This matter is going forward.

15. ***Carl Marks Retention Application.*** Debtors' Motion for Entry of an Order Authorizing the Debtors to (A) Retain Carl Marks Advisory Group LLC to Provide the Debtors a Chief Executive Officer, a Chief Financial Officer, and Additional Personnel and (B) Appoint the Chief Executive Officer and

Chief Financial Officer *Nunc Pro Tunc* to the Petition Date [Docket No. 64].

Objection Deadline: June 6, 2019, at 4:00 p.m. (prevailing Eastern Time).

Related Documents:

- A. Notice of Second Day Hearing [Docket No. 80].
- B. Certificate of No Objection Regarding Order Authorizing the Debtors to (A) Retain Carl Marks Advisory Group LLC to Provide the Debtors A Chief Executive Officer, A Chief Financial Officer, and Additional Personnel and (B) Appoint the Chief Executive Officer and Chief Financial Officer *Nunc Pro Tunc* to the Petition Date [Docket No. 135].

Responses Received:

- C. None.

Status: This matter is going forward.

- 16. ***Omni 327(a) Retention Application.*** Debtors' Application for Entry of an Order Authorizing and Approving the Employment and Retention of Omni Management Group as Administrative Advisor for the Debtors and Debtors in Possession *Nunc Pro Tunc* to the Petition Date [Docket No. 66].

Objection Deadline: June 6, 2019, at 4:00 p.m. (prevailing Eastern Time).

Related Documents:

- A. Notice of Second Day Hearing [Docket No. 80].
- B. Certificate of No Objection Regarding Order Authorizing and Approving the Employment and Retention of Omni Management Group as Administrative Advisor for the Debtors and Debtors in Possession *Nunc Pro Tunc* to the Petition Date [Docket No. 136].

Responses Received:

- C. None.

Status: This matter is going forward.

- 17. ***Houlihan Retention Application.*** Debtors' Application for Entry of an Order (A) Authorizing the Employment and Retention of Houlihan Lokey Capital, Inc. as Financial Advisor and Investment Banker to the Debtors *Nunc Pro Tunc* to the Petition Date, (B) Approving the Terms of the

Engagement Agreement, (C) Waiving Certain Time-Keeping Requirements, and (D) Granting Related Relief [Docket No. 69].

Objection Deadline: June 6, 2019, at 4:00 p.m. (prevailing Eastern Time).

Related Documents:

- A. Notice of Second Day Hearing [Docket No. 80].
- B. Certificate of No Objection Regarding Order (A) Authorizing the Employment and Retention of Houlihan Lokey Capital, Inc. as Financial *Nunc Pro Tunc* to the Petition Date, (B) Approving the Terms of the Engagement Agreement, (C) Waiving Certain Time Keeping Requirements, and (D) Granting Related Relief [Docket No. 133].

Responses Received:

- C. None.

Status: This matter is going forward.

- 18. ***Kirkland & Ellis Retention Application.*** Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Kirkland & Ellis LLP and Kirkland & Ellis International LLP as Attorneys for the Debtors and Debtors in Possession Effective *Nunc Pro Tunc* to the Petition Date [Docket No. 70].

Objection Deadline: June 6, 2019, at 4:00 p.m. (prevailing Eastern Time).

Related Documents:

- A. Notice of Second Day Hearing [Docket No. 80].
- B. Certificate of No Objection Regarding Final Order Authorizing the Retention and Employment of Kirkland & Ellis LLP and Kirkland & Ellis International LLP as Attorneys for the Debtors and Debtors in Possession Effective *Nunc Pro Tunc* to the Petition Date [Docket No. 134]

Responses Received:

- C. None.

Status: This matter is going forward.

- 19. ***Proskauer Rose Retention Application.*** Debtors' Application for Entry of an Order Authorizing the Retention and Employment of

Proskauer Rose LLP as Attorneys for the Debtors and Debtors in Possession Effective *Nunc Pro Tunc* to the Petition Date [Docket No. 71].

Objection Deadline: June 6, 2019, at 4:00 p.m. (prevailing Eastern Time).

Related Documents:

- A. Notice of Second Day Hearing [Docket No. 80].
- B. Certificate of No Objection Regarding Final Order Authorizing the Retention and Employment of Proskauer Rose LLP as Attorneys for the Debtors and Debtors in Possession Effective *Nunc Pro Tunc* [Docket No. 137]

Responses Received:

- C. None.

Status: This matter is going forward.

III. Adjourned Matters

- 20. ***Exit Financing Motion.*** Debtors' Motion for Entry of an Order (A) Authorizing the Debtors to Enter into Exit Backstop Commitment Letter and Fee Letters and (B) Granting Related Relief [Docket No. 18].

Objection Deadline: June 6, 2019, at 4:00 p.m. (prevailing Eastern Time).

Related Documents:

- A. Notice of Second Day Hearing [Docket No. 80].
- B. Certificate of No Objection Regarding Order (A) Authorizing the Debtors to Enter into Exit Backstop Commitment Letter and Fee Letters and (B) Granting Related Relief [Docket No. 140].
- C. Disclosure of Financing Fees and Notice of Hearings to (A) Consider Approval of the Debtors' DIP Term Loan Facility on a Final Basis and the Debtors' Entry Into Exit Financing Term Loan Commitment and Fee Letters and (B) Consider Approval of the Debtors' DIP ABL Facility on a Final Basis [Docket No. 149].

Responses Received: .

- D. Statement of the Official Committee of Unsecured Creditors Re: Debtors' Motion for Entry of an Order (A) Authorizing the Debtors to Enter Into Exit Backstop Commitment Letter and Fee Letter and (B) Granting Related Relief [Docket No. 110].

Status: This matter is adjourned to a hearing scheduled for July 17, 2019,
at 2:00 p.m., prevailing Eastern Time.

New York, New York
Dated: June 28, 2019

/s/ Joshua A. Sussberg, P.C.

Joshua A. Sussberg, P.C.

Christopher T. Greco, P.C.

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